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***IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA***

ARIZONA GRAND RESORT, LLC, a)
Delaware limited liability company,)

Plaintiff,)

vs.)

CROSSCOUNTRY MORTGAGE, INC.,)
JOHN AND JANE DOES I-X, ABC)
CORPORATIONS I-X, DEF, LLCs I-X,)
a foreign corporation,)

Defendants.)

Case No. _____

NOTICE OF REMOVAL

Defendant CrossCountry Mortgage, Inc. ("CCN") hereby files this Notice of Removal in the above captioned matter, pursuant to 28 U.S.C. §§ 1332 and 1441, and LRCiv 3.7, Rules of Practice of the United States District Court for the District of Arizona, and state the following in support of this Notice of Removal:

1. This action was filed originally in Maricopa County Superior Court, Arizona, on or about July 26, 2017 entitled: Arizona Grand Resort, L.L.C. v. Cross Country Mortgage, Inc., et al., Case No. CV 2017-011198 (hereinafter "State Court Action").

1 2. In accordance with 28 U.S.C. §1446(a) and LRCiv. 3.7, a copy of all
2 documents filed in the superior court from which this case is removed, is attached hereto
3 as Exhibit A, accompanied by counsel's verification.

4 3. On August 10, 2017, Defendant CCM, through its statutory agent CT
5 Corporation System in Arizona, was served with the Complaint, brought by Plaintiff
6 Arizona Grand Resort, LLC ("Arizona Grand") against CCM and other fictitious
7 Defendants in the Superior Court, Maricopa County, Arizona, and a summons addressed
8 to CCM. WIN was also served with a Certificate on Compulsory Arbitration and
9 Demand for Jury Trial along with the summons and Complaint.

10 4. The first count of the Complaint is against all Defendants and is based on
11 breach of contract. A second count is against all Defendants alleging unjust enrichment.
12

13 5. In the State Court Action, Plaintiff Arizona Grand claims to be a Delaware
14 limited liability company (Complaint ¶1). Defendant CCN is an Ohio corporation, with
15 its principal place of business located in Ohio.

16 6. Based upon the allegations contained in the Complaint and upon
17 information and belief of the amount demanded by Plaintiff, Defendant CCM believes
18 that the amount in controversy exceeds the jurisdictional requirement of \$75,000 for
19 removal of actions based on diversity.

20 7. This Court has independent jurisdiction over this matter based upon
21 diversity of citizenship, 28 U.S.C. §1332(a) and (c)(1). Therefore, this suit may be
22 removed to this Court by this Defendant pursuant to the provisions of 28 U.S.C. §1441.

23 8. This Notice is timely brought. Service was made on August 10, 2017.
24 Therefore, pursuant to 28 U.S.C. §1446(b), and *Murphy Brothers, Inc. v. Michetti Pipe*
25 *Stringing, Inc.*, 526 U.S. 344, 119 S.Ct. 1322, 143 L.Ed.2d 448 (1999), this Notice is
26 being filed within thirty (30) days of receipt and service of copy of the initial pleading
27 setting forth the Plaintiff's claims.
28

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2017, I electronically transmitted this document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF Registrants, and to the extent any party is not a CM/ECF Registrant at the time of filing this Notice of Removal, a copy is mailed this date by U.S. Mail:

David L O'Daniel
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Phoenix, AZ 85003
Attorneys for Plaintiffs

By s/ Stephen J. Anthony